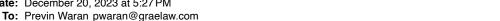


From: Casey Rahn crahn@graelaw.com @ 🏴

Subject: Re: Alvarez v Kelco - today's call
Date: December 20, 2023 at 5:27 PM
To: Previn Waran pwaran@graelaw.com



Steve.

As previously referenced in Previn's earlier correspondence today, enclosed, please find the Amended Notice of Deposition Upon Oral Examination for Mr. Umaña to take place at our offices on December 29, 2023. Should you have any questions, please do not hesitate to contact our offices.

Thanks

Casey J. Rahn I Senior Associate GRAE & GRAE, LLC The Equitable Building 120 Broadway, 28th Floor New York, NY 10271 (212) 221-8763 crahn@graelaw.com www.graelaw.com

Cc: Steven Moser steven.moser@moserlawfirm.com, Mark Grae mgrae@graelaw.com

I have very limited availability in January, but do have *some* dates on which Defendants' depositions can be scheduled. I am about to go into a deposition, but can provide some prospective dates once I'm out of today's proceedings. As for Plaintiffs' depositions, I do not have the scheduling flexibility to grant any further adjournments of presently scheduled depositions, though Mr. Umaña's deposition has yet to be rescheduled following my adjournment of same as a courtesy to you. I am available on December 29, 2023, to take his deposition, and will serve an Amended Notice of Deposition Upon Oral Examination for Mr. Umaña for such date by EOD, today. Thank you.

Best,

Previn A. Waran I Partner GRAE & GRAE LLC The Equitable Building 120 Broadway, Fl. 28 New York, New York 10271 (212) 221-8763 pwaran@graelaw.com www.graelaw.com

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On Dec 20, 2023, at 12:50 PM, Steven Moser < steven.moser@moserlawfirm.com> wrote:

Previn

This is to confirm that we will be asking the Court for leave to file a motion for a stay under seal based upon (1) personal/health issues and (2) the defendants' inquiries into alleged attorney misconduct. My understanding is that you are not available to produce the defendants for depositions in January due to scheduling conflicts, and cannot reschedule the depositions of the Plaintiffs due to such scheduling conflicts.



Steven J. Moser Managing Attorney, Moser Law Firm, PC



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- <u>steven.moser@moserlawfirm.com</u>

Chicas, re-23-12-20 - Amended Noti ce of Deposition (Mateo...

